

EXHIBIT OO

DIRECT EXAMINATION OF JENNIFER WATTS

1 him and the Department.

2 Q After that meeting, did the father participate in the future
3 meetings?

4 A He did.

5 Q So, what happened after that first meeting?

6 A I apologize, can you be more specific?

7 Q Sure. Yes, absolutely. What happened immediately after that
8 first meeting? Like, when you left that meeting while you're
9 [break in audio]—

10 A Yeah.

11 Q —DCYF office.

12 A Yeah, so we left the meeting. We left the—the conference
13 room that we were in, and we walked out back into the area
14 where the rows of desks were at. And we had heard some
15 screaming and yelling going on from the lobby.

16 Q Who—who heard the screaming?

17 A I'm pretty sure we all heard the screaming.

18 Q And what—what happened in response to the screaming?

19 A Well, immediately Shaylee was the first one to, like, bust
20 through the doors and then I was right behind her. And we
21 saw that there was a commotion in—in the lobby with the kids
22 and the security guards.

23 Q Can you describe what you saw in the lobby with the kids and
24 the security guards?

25 A Yes. There were two security guards. One security guard had

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1 J [REDACTED] and E [REDACTED] over on the far side of the lobby. And the
2 other security guard had A [REDACTED] in the lobby pinned
3 underneath the ledge of the check-in counter and the wall of
4 that ledge.

5 Q And when you say "pinned underneath the ledge," can you
6 describe that a little bit more? What--what was the security
7 guard doing with--with A [REDACTED]?

8 A Yeah, so the ledge, it's just like a ledge that goes--you
9 know, like--like the number seven if you were to look at it
10 from the side. And they were underneath that lip and they
11 were against the wall. And she had A [REDACTED] hand behind--or
12 his arm behind his back in a security [break in audio].

13 Q I'm sorry, you said she had--I missed that a little bit. You
14 said she had his arm behind his back in what type of--what--

15 A In--in like security hold that you would see [break in audio]
16 you know, you would see somebody use.

17 Q Like, who would you see use this kind of--what you describe
18 as a security hold?

19 A Typically you would see, like, anybody that wants to, you
20 know, get somebody into submission, whether it's a police
21 officer, a security guard. I mean, you see it, yeah, just
22 used whenever you want to--to keep somebody down.

23 Q Okay. And--and what was--what was A [REDACTED] doing while the
24 security guard had him pinned under the ledge with his arm
25 behind his back?

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1 A He was screaming, you know, yelling at her to get off of
2 him.

3 Q Okay. And you said his brothers were with a different
4 security guard? Can you describe what was happening there?

5 A Yeah, that security guard was holding the brothers back.
6 They were trying to get to A [REDACTED].

7 Q And you said there was yelling. Who—who was yelling?

8 A At that point all three of the boys were.

9 Q And what did—how did their mother respond to this? What did
10 their mother do?

11 A She immediately ran up to A [REDACTED] and pushed the security
12 guard off of A [REDACTED] and grabbed A [REDACTED] and went and sat down
13 on the blanket with him.

14 Q And did she do anything additional after she sat down on the
15 blanket with A [REDACTED]?

16 A She did put A [REDACTED] on her lap and she was consoling him.

17 Q Okay. And how did A [REDACTED] respond to his mother consoling
18 him?

19 A He leaned into her, and he started crying. And he started
20 letting her know what happened.

21 MS. REDMAN: I don't have anything else.

22 THE COURT: All right. You don't have any other questions?

23 MS. REDMAN: I don't, Your Honor.

24 THE COURT: All right. And let me turn to the Mother's
25 side. Are there any questions?